

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo CN 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re:  Richard Cabrera AnnaMaria Cabrera  Debtor(s)	Case No. 19-30799 / MBK  Hearing Date: January 8, 2020 10:00 am  Judge: Michael B. Kaplan  Chapter: 13

**TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN**

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

**The debtor has failed to supply the Trustee with the following document(s):**

**A current market analysis - which provides comps used to give value.**

**Proof of 2 month's income - for Debtor for the month of Sept. 2019, only provided Oct.**

**A copy of the homeowner's insurance renewal declaration - insurance expired 12/5/19.**

**bank statements from all accounts prior to filing date to determine equity.**

**The debtor(s) plan consists of unnecessary or excessive expense items, such as: Electricity/heat/gas \$490, Childcare/Children education \$416.67 and Student loans \$300 (Plan does not list student loans to be treated outside.)**

**The current Plan does not specify treatment of Student loans under the Plan.**

**The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4): There is non-exempt equity on bank accounts, pending review of Debtors statements.**

**Must file Pre-confirmation certificate.**

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo  
Standing Chapter 13 Trustee  
by: Erik Collazo, Staff Attorney